o: The Honorable Alvin K. Hellerstein Page 2 of 3 2020-03-13 16:25:23 (GMT) 16466075386 From: Wagner Berkow & Brandt, LLP Case 1:18-cv-05436-AKH Document 40 Filed 03/13/20 Page 1 of 2

WAGNER, BERKOW& BRANDT, LLP

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 3/13/2026

462 7th Avenue, 6th Floor New York, New York 10018 Ph. 646-780-7272 Fax. 646-736-5322

IAN J. BRANDT, ESQ.
DIRECT DIAL NO.: 646-791-2086
E-MAIL ADDRESS: UBRANDT@WAGNERBERKGW.COM

March 13, 2020
So Sold Hole A

BY ECF AND FACSIMILE (212) 805-7942

The Honorable Alvin K. Hellerstein United States District Court Southern District of New York United States Courthouse 500 Pearl Street, Room 1050 New York, NY 10007

Re: Jane Doe v. Halstead Property, LLC et al, Civil Docket No. 1:18-cv-05436-AKH

Honorable Sir:

This office represents Plaintiff Jane Doe in the above-referenced action. I respectfully request an enlargement of time to file Plaintiff's opposition papers to Defendants' Motion for Summary Judgment which was filed on February 14, 2020 pursuant to the Court's January 10, 2020 scheduling order. Plaintiff's opposition papers are due today, March 13, 2020. I understand that the Court's Individual Rule 1(D) requires the parties to make such a request on 48 hours' notice before the scheduled deadline. However, I request an extension of time to file Plaintiff's opposition papers to Tuesday, March 17, 2020, due to my office being unexpectedly short staffed as a result of apparent self-quarantining in connection with Coronavirus.

We have conferred with Defendants' counsel who consents to this adjournment and the parties mutually request to enlarge Defendants' time to file their reply papers from Monday, March 23, 2020 to Friday, April 3, 2020, with a new motion return date of Monday, April 6, 2020

This is the first time an adjournment has been requested in connection with this motion practice. There are no other scheduled appearances or filing deadlines in this action other than these referenced above.

Case 1:18-cv-05436-AKH Document 40 Filed 03/13/20 Page 2 of 2

Judge Hellerstein Page 2 March 13, 2020

Please be advised we are also now lifting the pseudo-anonymity of Plaintiff to release her actual identity, Geannetta Jackson.

> Respectfully submitted, Ian J. Brandt

CC:

Andrew P. Saulitis (by electronic mail) Law Offices of Andrew P. Saulitis P.C. Attorneys for Defendants 40 Wall Street-37th Floor New York, New York 10005 tel (212) 459-0900 efax (646) 219-3066 email apslaw@msn.com

The Honorable Debra Freeman (by ECF) United States Magistrate Judge United States District Court Southern District of New York United States Courthouse 500 Pearl Street, Room 1050 New York, NY 10007